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Board of Directors of Jusan Bank JSC  
dd. April 19, 2023 No. 19/04/23-01]

## Human Rights, Variety and Equal Opportunities Policy

<b>Owner:</b>	Corporate Communication Service	
<b>Co-owner:</b>	-	
<b>Developer:</b>	Corporate Communication Service	
<b>Regulation entity:</b>	All subdivisions of the Bank	
<b>Approved by:</b>	The Board of Directors (Minutes No. _____)	dd. _____ 20
<b>Repealed ID</b>	-	

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## **Chapter 1. General provisions**

1. This Human Rights, Variety and Equal Opportunities Policy (hereinafter – the Policy) shall define the general provisions and business areas of Jusan Bank JSC (hereinafter – the Bank) in the sphere of human rights, variety and equal opportunities and shall be a public document voluntarily accepted.

2. The Policy was developed in accordance with the legislation and the Constitution of the Republic of Kazakhstan (hereinafter – the RK), international standards and norms in the sphere of protection of the human rights fixed in the United Nations Universal Declaration on Human Rights, accepted and announced by Resolution 217 A (III) of the General Assembly dd. 10.12.1948, the International Covenant on Economic, Social and Cultural Rights, accepted by Resolution 2200 A (XXI) of the General Assembly dd. 16.12.1966 as well as in the Bank's internal documents.

3. The Policy's goal shall be compliance with the human rights as per the best international norms and standards, equal opportunities, recordkeeping of the unique personal characteristics and avoidance of a discrimination at all stages of performance of own activity.

4. The Policy's requirements shall be compulsory to be executed by all subdivisions of the Bank.

5. The Policy shall be considered together with listed in clause 2 of the Policy the international and legal acts, the legislation of the RK and the Bank's internal documents.

6. The Bank welcomes the compliance by the customers, suppliers, business partners and other parties concerned with the human rights, basic principles of variety and equal opportunities in the course of its activity.

## **Chapter 2. Glossary**

7. The basic definitions and abbreviations applied in these Rules

1) the business partners – the suppliers, consultants and other persons who have any relations with the Bank;

2) the discrimination – any restriction or prejudice of the rights and freedoms of the human as well as provision of any advantages depending on the circumstances, not tied to the business qualities of the human in terms of the origination, social, position and property position, sex, gender, ethnic group, language, relation to religion, beliefs, place of residency, age or physical disadvantages, belonging to the private associations or under other circumstances;

3) a party concerned – a person or the group of persons to one extent or another engaged in the Bank's activity interested in cooperation with the Bank, that have an impact on the Bank or under influence of the Bank;

4) the inclusivity – creation of the conditions wherein different social and cultural groups of people and every employee separately shall value, accept and respect for the unique skills, experience and prospects of development as well as wherein they are provided with equal opportunities to participate in the Bank's progress regardless of any circumstances;

5) the human rights – the integral rights of every person the basis of which is recognition of the value inherent to the human being as well as freedoms and equality of all people;

6) the forced labor – any activity, work or service required from any person under a threat of any enforcement or punishment and for which such person didn't offer his services;

7) the equality – the principle of respectful attitude to peculiarities and factors justified the difference between the employees, opportunities and other unique characteristics of the employees and as the result provision to the employees with equal opportunities;

8) the equal opportunities – the approach within the relation to all employees shall be equal and not affected by the discriminatory factors;

9) the variety – the specificity of the work environment focused on acceptance of different in the culture and social plan of the groups and persons as well as for adequate and impartial evaluation of their specific skills, competences, development prospect and other peculiarities.

## **Chapter 3. Basic methods and principles**

8. The Bank's basic method shall consist of:

1) all people are free and equal in their dignity and rights regardless of sex, language, age, confession, ethnic and race origin, social origin, property position or other marks and peculiarities;

2) the Bank strives to avoid any forms of discrimination or invasion for human dignity on any grounds and peculiarities;

3) the Bank doesn't accept any form of child labor that not complied with the legislation of the RK as well as the Bank demonstrates a zero tolerance to any form of enforcement labor and human traffic;

4) the Bank strives to reveal and prevent from any adverse consequences in the sphere of human rights within its activity, exercising due diligence;

5) the Bank complies with the rights of all employees including freedom for giving the opinions and holding the collective bargaining. None of the employees of the Bank can not be restricted in the labor rights except for the cases and according to the procedure stipulated for the legislation of the RK;

6) the Bank strives to ensure every employee with the right to receive and provide a regular back communication.

9. The relations with the customers shall be based on the principles of justice and respect of the human rights. Adoption of the decisions on provision of the bank servicing shall be made with taking note of the financial stability, legal capacity, work capability and other requirements to the customers pursuant to the legislation of the RK.

10. The Bank shall ensure compliance of a bank secret, confidentiality of the personal data and other protected by the law secret of the customers, suppliers, partners, employees and other persons as per the requirements of the legislation of the RK.

11. The Bank reserves the right to carry out the procedure of the evaluation of the potential customers, business partners including the projects for social and ecological impact.

12. The Bank respects the needs of the persons with physical disability, striving to create the barrier-free environment and to ensure availability of its offices.

13. The Bank welcomes presence of the business partners of clearly formed corporate position for the human rights.

14. The Bank does not accept any actions that promote, motivate or incite other people or other companies to breach the human rights.

#### **Chapter 4. Variety and equal opportunity principles**

15. Ensuring the variety, equal opportunities and inclusivity for the Bank's employees shall be the important factor to ensure the long-term development and competitive power of a modern financial institution. Considering that the Bank intends to maximumly ensure the aforesaid opportunities focusing on the following basic principle and methods:

##### **1) Equal opportunities.**

The Bank provides with equal opportunities for all candidates for the work places and the employees in accordance with the clearly formed and generally accepted rules of employment and labor rate setting with taking note of the available competences and within the position instructions regardless of the individual identifying characteristics not tied to business quality of the person.

This principle shall be applied to all aspects of the labor activity of the employees of the Bank, including payment and terms of the labor, training, carrier progression, behavior at work, disciplinary procedures as well as termination of the labor relations in accordance with the legislation of the RK and the Bank's internal documents.

The Bank does not accept any invasion on human dignity including all forms of oppression, mortification and harassment as well as any form of protection including based on the family ties. All forms of harassment at work place including verbal, physical and mental shall be protected.

##### **2) Motivation of the variety.**

Positioning the variety as the competitive power, the Bank focuses on creation of all round in cultural and social plan corporate body.

The Bank supports the unicity of every employee and avoids direct or indirect discrimination at any form.

The Bank respects the variety of the personal values and world views as well as doesn't prevent from open giving the opinions and points of view of the employees.

##### **3) Worth and comfort work environment.**

The Bank shall form worth and comfort work environment for every employee. The Bank complies strictly with the labor legislation of the RK. The labor conditions created by the Bank shall comply with the requirements of the legislation in the sphere of ensuring the protection of health and security of the RK as well as the demands that met the Bank's internal documents.

The Bank incites the transparency in the labor relations, assists all employees to be in progress and build a career providing support, mentoring and creating the conditions for professional growth.

The Bank strives to support the competitive and descent standard of level of payment for labor of the employees. A remuneration amount of the members of the Management Body, Executive Body and the employees shall be formed on the basis of the objective factors tied to exclusively with the efficiency of execution of the official duties as per the Bank's internal documents.

The Bank shall provide all employees with the social guarantees pursuant to the requirements of the legislation of the RK.

The Bank incites any initiatives and ideas of the employees, implementation of which may be important for the Bank's development.

#### **Chapter 5. Execution of the principles and methods of the Policy**

16. The Bank shall arrange the familiarization of the employees with the Policy through posting the internal document on the Bank's website.

17. The Bank shall carry out an internal monitoring and control over compliance of its activity with the principles and methods as approved by the Policy.

18. The Bank's employees in case of reveal of any violation of the Policy shall be obliged promptly inform about it.

19. The Bank shall ensure the employees and other parties concerned with an opportunity to inform freely on possible breaches of the Policy's provisions ensuring confidentiality of the appeals.

20. All appeals on violations of the Policy's provisions shall be sent using all possible channels of communications and shall be accepted and considered by the responsible subdivisions within its functions in the periods stipulated for the legislation of the RK and the Bank's internal documents.

21. When revealing the factors of the violation of the Policy's provisions the structural subdivision responsible for internal control shall take measures for elimination and prevention of such violations.

22. The Bank adheres to the principle of absolute intolerance to the response measures in relation to the employees who informed about possible violation of the Policy event if such concerns are not confirmed subject to the unreliable information were not informed intentionally or with the mercenary motives.

23. Noncompliance with the Policy's provisions can be a reason to make the employee who violated the Policy the disciplinary liable in accordance with the standards of the legislation of the RK as well as the Bank's internal documents.

#### **Chapter 6. Control over execution of the Policy**

24. The employees and the heads of the structural subdivisions, heads of the Bank's branches shall be responsible for failure to fulfill or improper fulfillment of the Policy's provisions.

#### **Chapter 7. Final provisions**

25. The Policy shall become effective at expiry of five (5) business days from the day of approving by the Board of Directors, if the decision of the Board of Directors didn't set another period of making it effective.

26. The Policy shall be reconsidered as deemed necessary but not less than one (1) time in every two (2) years for its applicability and compliance with applicable norms and standards.

27. The decision on repealing the Policy shall become effective as of the day of making effective of a new version of the Policy or substituting it the internal document or at expiry of five (5) business from the day of adoption of the decision by the Board of Directors unless other period provided by the decision of the Board of Directors.

28. The provisions not regulated by the Policy shall be regulated by the legislation of the RK and the Bank's internal documents.

29. In case of change of the legislation of the RK and occurrence of the discrepancies between the Policy's provisions and the legislation of the RK, so such provisions of the Policy shall be obsolete and the Bank's employees shall be guided in their work by the legislation of the RK before making appropriate amendments and additions to the Policy.